

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

---

<b>In re:</b>	) <b>Chapter 11</b>
	)
	) <b>Case No. 18-23538 (RDD)</b>
<b>SEARS HOLDING CORPORATION, et al.,</b>	) <b>(Joint Administration Pending)</b>
	)
<b>Debtors.</b>	) <b>Hon. Robert D. Drain</b>
	)

---

**MOTION FOR ADMISSION TO PRACTICE, *Pro Hac Vice*,  
BY CREDITOR PENSION BENEFIT GUARANTY CORPORATION  
FOR UNITED STATES GOVERNMENT ATTORNEY ERIN C. KIM**

I, Erin C. Kim, a member in good standing of the bar of the State of California, respectfully request admission, *pro hac vice*, before the Honorable Judge Robert D. Drain, to represent the Pension Benefit Guaranty Corporation ("PBGC"), a creditor in this case. The grounds for this motion ("Motion") are as follows:

The PBGC is a United States Government agency that administers and enforces the pension plan termination program established under Title IV of the Employee Retirement Income Security Act of 1974, *as amended*, 29 U.S.C. §§ 1301-1461(2012 & Supp. IV 2016) ("ERISA"). Under the Local Rules of the Bankruptcy Court for the Southern District of New York, an attorney "in good standing of the bar of any state or of any United States District Court may be permitted to practice in this Court" upon motion to the Court, in compliance with Local Rule 2090-1(b).

My mailing address is: Pension Benefit Guaranty Corporation, Office of the General Counsel, 1200 K Street, N.W., Washington, D.C. 20005.

My e-mail address is: kim.erin@pbgc.gov. My telephone number is (202) 326-4020, ext. 3399.

The Pension Benefit Guaranty Corporation is a U.S. Government agency and is therefore exempt from filing fees.

Dated: October 15, 2018  
Washington, D.C.

Respectfully submitted,

/s/ Erin C. Kim  
Erin C. Kim  
Pension Benefit Guaranty Corporation  
Office of the General Counsel  
1200 K Street, N.W.  
Washington, D.C. 20005  
Telephone: (202) 326-4020, ext. 3399  
Fax: (202) 326-4112  
Emails: kim.erin@pbgc.gov *and*  
efile@pbgc.gov